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United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

July 28, 2020

Hon. P. Kevin Castel U.S. District Court for the Southern District of New York 500 Pearl Street New York, NY 10007

> United States v. Joseph Davila, et al., 20 Cr. 292 (PKC) Re:

Dear Judge Castel:

The Government respectfully requests an adjournment of the July 28, 2020 deadline to respond to the defendants' letter seeking certain records relating to the selection of the grand jury that returned the indictment in this case. The Government has conferred with Joseph Davila's attorney, Michael Bachrach, Esq., regarding the defendants' requests. The parties believe that are nearing an agreement on most, if not all, of those requests, but need additional time to identify any areas of disagreement. Accordingly, the Government respectfully requests that the Court adjourn the current deadline for the Government to respond to the defendants' letter and set a new deadline for August 11, 2020, at which time the parties will submit a joint letter describing the scope of their agreement and their respective positions on any disagreements.) The attorneys for the defendants consent to the proposed adjournment and the plan to submit a joint letter.

Respectfully,

**AUDREY STRAUSS** Acting United States Attorney

/s/ Thomas Burnett by: Thomas S. Burnett

Assistant United States Attorney

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Ambutton GMJSDJ 7-28-20